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UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION III
303 Methodist Building
11th & Chapline Streets
Wheeling, WV 26003

VIA FACSIMILE TRANSMISSION
AND FEDERAL EXPRESS
OVERNIGHT DELIVERY

AUG 18 1995

Mr. Bren Huggins
ERM, Inc.
3140 Chaparral Drive, SW
Suite 201
Roanoke, VA 24018

Re: Virginia Scrap Iron and Metal - Roanoke Avenue Site
City of Roanoke, Virginia

Dear Mr. Huggins:

EPA is in receipt of the Virginia Scrap Iron and Metal-Roanoke Avenue Site Supplemental Removal Plan developed by Environmental Resources Management, Inc. (ERM) submitted to EPA by letter dated July 14, 1995 from Mr. Bren Huggins, ERM, Inc. to Jeffrey A. Dodd, U.S. EPA, Region III. Pursuant to Paragraph 8.9 of Administrative Order, Docket No. III-95-09-DC ("Order"), this letter provides notification of EPA's disapproval of the Supplemental Removal Plan (SRP). Specific deficiencies are noted below.

I. Supplemental Removal Plan

1. General Comments

- a. The SRP does not adequately specify the removal and disposal of contaminated water and or wastes generated as a result of on-site activities. The SRP must be revised to provide additional details concerning this requirement as required by Paragraph 8.3.j of the Order.
- b. The SRP must specify if a hazardous waste generator identification number is required, whether one has been obtained, and/or the procedures for obtaining such a number as required by Paragraph 8.3.1 of the Order.

2. Figure 1

- a. It appears that Figure 1 of the Health and Safety Plan (HASP) was inadvertently presented in the

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SRP, i.e., there are 2 different Figure 1's contained in the SRP and no Figure 1 present in the HASP.

3. Section 1.3

- a. Summary of the analytical results from the Field Investigation Report dated 5/17/95 would be a helpful attachment of the SRP.
- b. Figure 3, as indicated in paragraph 2 in page 4, does not identify the area with lead concentration exceeding Removal Response Goal (RRG).
- c. Inclusion of approximate length and width of pile #1 in this section would be helpful.

4. Section 2.1

- a. Figure 3 does not define the removal areas (debris pile #1 and #2). Also, no area surrounding the debris pile #2 has been highlighted on Figure 3. See comment 1a above.
- b. Two composite samples have been planned for collection from the two debris piles for Toxicity Characteristics Leachate Procedure (TCLP) analysis. The SRP should include how many samples will be collected from each pile, depth and location of samples, and procedures for compositing samples.
- c. The last sentence of the first paragraph should also state that additional removal in any areas is subject to EPA approval.

5. Section 2.2 - Disposal Options

- a. The last sentence of the second paragraph must also state that the qualifications of the disposal facility will be submitted to the EPA and is subject to EPA approval pursuant to Paragraph 8.2 of the Order.

6. Project Organization Chart - Figure 4

- a. The Project Organization Chart presented as Figure 4 shows the names and designations of the key project personnel. The SRP includes designations such as Site Manager, Project Manager, Site Health & Safety Coordinator, Site Safety & Health Supervisor, CQA Engineer, etc. which do not appear in the Project Organization Chart. The SRP should be reviewed and rewritten maintaining the

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designations of the key personnel consistent with the Project Organization Chart (Figure 4), or the Project Organization chart revised to include the key personnel as specified in the SRP.

7. Figure 3 - Removal Area Map

- a. This map does not clearly identify the areas proposed for excavation.
- b. It appears from the map that a part of debris pile #1 extends into the woods. If any area in the woods is intended for remediation, the SRP should reflect that intention.

8. Section 5.1

- a. Figure 3 does not delineate the removal areas. See comment 1a above.

9. Section 5.5

- a. The last sentence of the first paragraph must also state that the qualifications of the disposal facility will be submitted to the EPA and is subject to EPA approval pursuant to Paragraph 8.2 of the Order.

10. Section 6.2

- a. The locations of the confirmation samples should be identified on a site map.
- b. At least 2 additional confirmation samples must be collected at the periphery of the excavated area of debris pile #1 to the north of sampling points DP1-6 and DP1-1.
- c. One additional confirmation sample must be collected at the periphery of the excavated area of debris pile #2 to the north-northwest of sampling point DP2-1.

11. Section 6.4

- a. The term EPA RPM should be changed to read EPA OSC.

12. Section 7.2

- a. The bucket of the heavy equipment that comes in contact with the contaminated soil must be thoroughly decontaminated. Also, confirmation

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samples should be collected from the equipment after decontamination.

13. Section 8.4

- a. The list of authorized personnel should include EPA contractors.

14. Section 8.7.3

- a. The term RAP should read as SRP.

15. Section 11.2.1

- a. It would be appropriate to identify the Construction Quality Assurance (CQA) Engineer in this section and in Figure 4.

15. Section 11.5.1

- a. The contents of the final report specified in Section 11.5.1 address only those phases of the work undertaken as specified in the SRP. The final report submitted to EPA pursuant to Paragraph 8.11 of the Order must detail the work undertaken to implement the RAP and the items identified in Paragraph 8.3 of the Order.

II. Health and Safety Plan

1. Section 1.4

- a. Figure 1 was not included in the HASP as indicated. See comment I.2.a above.

2. Section 1.5, Table 1

- a. The IDLH for lead is 100 mg/m³, not 700 mg/m³.

3. Section 1.6, List of Potential Physical Hazards

- a. This section does not include any list of potential physical hazards.

4. Section 1.9

- a. There should be a provision in the SRP for recording all air monitoring data in the site log book.

5. Section 1.11, Table 3

- a. The action levels for lead should be revised using the highest concentration of lead detected at the

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Site thus far, 5,210 mg/Kg. The "Note" section below the table should be updated and the action levels adjusted accordingly.

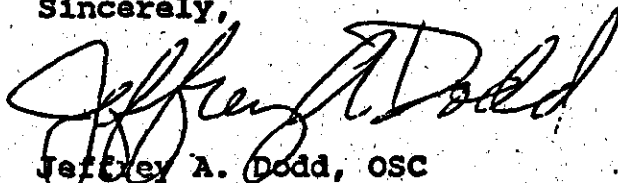
6. Section 1.14

- a. The directions to the hospitals should include estimated distance and driving time from the site.

Pursuant to Paragraph 8.9 of the Order, Respondent shall amend and submit to EPA a revised submission that responds to and corrects the specified deficiencies within five (5) business days of receipt of this disapproval. Failure to resubmit the SRP which addresses the deficiencies specified herein shall be deemed a violation of the Order.

Please contact me at (304) 234-0254 if you have any questions.

Sincerely,



Jeffrey A. Dodd, OSC
U.S. EPA Region III Removal Enforcement Section

cc: Karen Melvin, U.S. EPA Region III, Rem. Enf. Sect. (3HW33)
Brian Croft, TAT-Delran
Samuel Golden, Virginia Scrap Iron and Metal, Co.

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